

June 29, 2022

VIA ECF

The Honorable Taryn A. Merkl, U.S.M.J.
U.S. District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Black v. 7714 Entertainment, Corp. et al., 1:21-cv-04829 (MKB) (TAK)

Dear Magistrate Judge Merkl:

This firm represents Plaintiff Nashay Black. We submit this letter to respectfully request that we be permitted to withdraw as Plaintiff's counsel under Local Civ. R. 1.4.

In support of this motion, we are submitting my declaration that details the reasons for this request. We, however, filed it under seal and respectfully submit that it should remain under seal to "preserve the confidentiality of the attorney-client relationship between a party and [his] counsel, [which . . .] is viewed favorably by the courts." *Thekke v. LaseSculpt, Inc.*, 11-cv-4426, 2012 U.S. Dist. LEXIS 7646, at *7 (S.D.N.Y. Jan. 23, 2012) (granting counsel's request to file under their motion to withdraw under seal to protect information subject to the attorney-client privilege).

As set forth in my declaration, satisfactory reasons for withdrawal exist under Local Civ. R. 1.4. Namely, an irreconcilable conflict exists with Plaintiff. She has become increasingly difficult to work with, to the point further representation is inappropriate and would be unreasonably difficult. *See Guzik v. Albright*, No. 16-cv-2257 (JPO), 2019 U.S. Dist. Lexis 124360, at *24-25 (S.D.N.Y. July 25, 2019) (explaining withdrawal is appropriate where a client is unreasonably difficult or where the client has challenged counsel's loyalty and integrity). If past is prologue, our attorney-client relationship will only further deteriorate as she becomes more difficult to work with.

We truly regret that it has come to this. We have invested significant time and resources into this case, and we strongly believe in Plaintiff and her case, but these conflicts are too great to overcome. We, therefore, respectfully request that the Court grant the motion to withdraw as Plaintiff's counsel.

We thank the Court for its time and attention to this matter.

Respectfully submitted,
LIPSKY LOWE LLP

s/ Douglas B. Lipsky
Douglas B. Lipsky

cc: 7714 Entertainment, Corp. (Via Regular Mail)
Nashay Black (via First Class Mail and Email)